

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Jared Goyette, Craig Lassig, and The
Communications Workers of America, *on
behalf of themselves and other similarly
situated individuals,*

Court File No. 0:20-cv-1302
(WMW/DTS)

Plaintiffs,

v.

**STIPULATION TO FILE SECOND
AMENDED COMPLAINT AND
EXTEND TIME FOR
DEFENDANTS TO RESPOND TO
SECOND AMENDED COMPLAINT**

City of Minneapolis; Minneapolis Chief
of Police Medaria Arradondo *in his
individual and official capacity,*
Minneapolis Police Lieutenant Robert
Kroll, *in his individual and official
capacity,* Minnesota Department of
Public Safety Commissioner John
Harrington, *in his individual and official
capacity,* Minnesota State Patrol Colonel
Matthew Langer, *in his individual and
official capacity,* and John Does 1-2, *in
their individual and official capacities,*

Defendants.

Pursuant to Fed. R. Civ. P. 15, the parties hereby stipulate as follows:

1. Plaintiffs Jared Goyette, Craig Lassig, Michael Shum, Katie Nelson, Tannen Maury, Stephen Maturen, and the Communications Workers of America (“Plaintiffs”) may file their Second Amended Complaint.

2. Defendants’ deadline to answer or otherwise respond to the Second Amended Complaint is September 14, 2020.

Accordingly, the parties respectfully request that the Court enter an order adopting this stipulation.

Dated: July 29, 2020

/s/ Kevin C. Riach

Kevin C. Riach (#0389277)

Dulce J. Foster (#0285419)

Pari I. McGarraugh (#0395524)

Jacob P. Harris (#0399255)

FREDRIKSON & BYRON, P.A.

200 South Sixth Street, Suite 4000

Minneapolis, MN 55402-1425

(612) 492-7000

kriach@fredlaw.com

dfoster@fredlaw.com

pmcgarraugh@fredlaw.com

jharris@fredlaw.com

Adam W. Hansen (#0391704)

APOLLO LAW LLC

333 Washington Avenue North, Suite 300

Minneapolis, MN 55401

(612) 927-2969

adam@apollo-law.com

Teresa Nelson (#269736)

Isabella S. Nascimento (#0401408)

**AMERICAN CIVIL LIBERTIES UNION
OF MINNESOTA**

P.O. Box 14720

Minneapolis, MN 55414

(651) 529-1692

tnelson@aclu-mn.org

inascimento@aclu-mn.org

Attorneys for Plaintiffs

KEITH ELLISON
Attorney General
State of Minnesota

Dated: July 29, 2020

/s/ Juliana F. Passe

Kathryn Iverson Landrum (#0389424)
Julianna F. Passe (#0397317)
445 Minnesota Street, Suite 1400
St. Paul, Minnesota 55101-2131
(651) 757- 1189
kathryn.landrum@ag.state.mn.us
julianna.passe@ag.state.mn.us

***Attorneys for Defendants Minnesota
Department of Public Safety Commissioner
John Harrington and Minnesota State Patrol
Colonel Matthew Langer***

CITY ATTORNEY'S OFFICE
City of Minneapolis

Dated: July 29, 2020

/s/ Heather Robertson

Kristin R. Sarff (#388003)
Heather Robertson (#390470)
Assistant City Attorneys
City Hall, Room 210
350 South Fifth Street
Minneapolis, MN 55415
(612) 673-3919

***Attorneys for Defendants City of
Minneapolis and Minneapolis Police Chief
Medaria Arradondo***

Dated: July 29, 2020

/s/ Kevin M. Beck

Joseph A. Kelly (#0389356)

Kevin M. Beck (#0389072)

KELLY & LEMMONS, P.A.

2350 Wycliff Street, Suite 200

St. Paul, MN 55114

(651) 224-3781

jkelly@kellyandlemons.com

kbeck@kellyandlemons.com

*Attorneys for Defendant Minneapolis Police
Lieutenant Robert Kroll*